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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA, SACRAMENTO DIVISION

14 | LAURA WYLIE, an individual,,

15 Plaintiff,

16 v.

17 MERCK & CO., INC., a New Jersey
18 Corporation; MERCK SHARP & DOHME
19 CORP., a New Jersey Corporation;
ORGANON & CO., a Delaware Corporation;
ORGANON LLC, a Delaware Limited
20 Liability Company; and DOES 1-10,
Inclusive,

Defendants.

Case No. 2:22-cv-00604-WBS-DB

**STIPULATION FOR CONTINUANCE OF
BRIEFING SCHEDULE ON
DEFENDANTS' MOTION TO DISMISS
CLAIMS; ORDER**

(Local Rules 143, 144, and 230(f))

The Hon. William B. Shubb

STIPULATION

WHEREAS, the above-captioned action was removed to federal court by Defendants on or about April 5, 2022;

WHEREAS, Defendants filed a Motion to Dismiss Plaintiff Wylie's Claims on April 12, 2022, which is set for hearing on June 27, 2022, at 1:30 P.M., in Courtroom 5 (ECF Dkt No. 6);

WHEREAS, Plaintiff contends she needs additional time to prepare the response to Defendants' Motion, which is presently due 14 days from the date of filing of Defendants' motions (by April 26, 2022) under Local Rule 230(c);

WHEREAS, Defendants do not object to a 15-day extension of the current briefing schedule;

WHEREAS, Plaintiff contend good cause exists to a proposed extension of the current briefing schedule on Defendants' Motion to Dismiss Plaintiff's Claims by at least 15 days to permit Plaintiff additional time to prepare the response to the Motion filed by Defendants, particularly as this case is one of four potentially related cases recently removed to federal court by Defendants and anticipates additional motions practice in those cases with near-in-time deadlines for responses;

WHEREAS, this is the first-such request for an extension of time; and

WHEREAS, this stipulated request is made prior to Plaintiff's deadline for response to Defendants' Motion and the hearing date on the Court's calendar is more than 7 days away,

NOW, THEREFORE, THE PARTIES STIPULATE TO THE FOLLOWING:

1. Plaintiff's deadline to file a response to Defendants' Motion to Dismiss Claims shall be extended by approximately 15 days, to May 11, 2022;

2. Defendants' deadline to file a reply in support of Defendants' Motion to Dismiss Claims shall be filed no later than 14 days after Plaintiff's response to Defendants' Motion to Dismiss. Claims is filed to May 25, 2022;

3. The hearing on Defendants' Motion to Dismiss Claims shall remain as noticed for June 27, 2022 at 1:30 P.M. in Courtroom 5.

1 IT IS SO STIPULATED.

2 DATED: April 21, 2022

BOUCHER LLP

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4 By: /s/ Shehnaz M. Bhujwala
5 SHEHNAZ M. BHUJWALA

6 *Attorneys for Plaintiff*

7 DATED: April 21, 2022

8 VENABLE LLP

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10 By: /s/ Shannon E. Beamer (as authorized on
11 April 21, 2022)
12 SHANNON E. BEAMER
NICOLE N. KING

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15 *Attorneys for Defendants*

16 IT IS SO ORDERED.

17 Dated: April 22, 2022

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19 WILLIAM B. SHUBB
20 UNITED STATES DISTRICT JUDGE
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